

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Stephen M. Mahood, Director

OFFICE OF THE DIRECTOR

P.O. Box 176 Jefferson City, MO 65102-0176

April 6, 1998

Dr. Rob Mullins, Jr.
Project Manager
U.S. Army Corps of Engineers
FUSRAP Office
9170 Latty Avenue
Berkeley, MO 63134

Dear Dr. Mullins:

The U.S. Army Corps of Engineers has submitted for agency review Engineering Evaluation/Cost Analysis reports (EE/CAs) for the St. Louis Airport Site (SLAPS) and Hazelwood Interim Storage Site (HISS). I am pleased to provide the following comments on behalf of the Missouri Department of Natural Resources. I also have appended my testimony presented at the March 17th public hearing which should be added to the formal record.

The department commends the Corps of Engineers' commitment to remedy the adverse environmental situation currently existing in the St. Louis area due to the Manhattan Engineering District/Atomic Energy Commission (MED/AEC) activities. The proposed actions are the continuation of the long-awaited remedial action at the St. Louis Formerly Utilized Sites Remedial Action Project (FUSRAP) sites.

The Corps has made the correct decision in the selection of the 5/15 cleanup criteria. That is the proper technical cleanup criteria and it is in agreement with the wishes of area citizens. However, the use of contaminated material between 5 picocuries per gram and 15 picocuries per gram for backfilling poses several very significant problems that cannot be justified by the very minor projected four percent cost savings. If the Corps will agree to utilize clean fill for backfilling, then there will exist broad agreement between citizens and their government regarding the proposed cleanup. As stated in my testimony presented at the public hearing held in St. Louis on March 17, 1998, the Department of Natural Resources supports Alternative 2C for SLAPS and Alternative 3 for HISS and its associated vicinity properties.

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An issue of significant concern in the EE/CAs is the decision to portray future industrial use of these sites as a "worst case scenario" for analysis. A more realistic "worst case scenario" is future residential use since residential developments presently exist adjacent to the sites. Also, the possibility of obtaining drinking water from the aquifer beneath the sites should be a factor in worst case risk calculations because the aquifer is currently being used for domestic water supply in St. Louis County.

In addition to the groundwater consumption pathway, the issue of Actinium and Protactinium also needs to be addressed in the risk assessment. The lack of accurate data for these radionuclides remains a matter of concern. All future sampling events should include analysis for Ac-227 and Pa-231.

In addition to radionuclides, chemical contaminants are also of concern at these FUSRAP sites. The Corps must develop plans to remediate these FUSRAP sites to safe levels for both radionuclides and chemical contaminants, such as solvents and metals that were associated with MED/AEC activities. All contaminants of concern should be considered in the risk scenarios. It is known that 600 ppb TCE has been detected in at least one monitoring well.

Water management needs to be addressed in more detail in the EE/CAs. Water management during remediation should address the issues of infiltration to groundwater, surface water runoff, and potential flooding issues. Great care must be exercised so that contamination is not inadvertently spread.

We recommend that more information on the plans for protection of workers, public, and the environment during the implementation phase of the cleanup should be included in the EE/CAs. Radon is not discussed at all in any of the documents or how it will be handled if encountered.

Groundwater at both SLAPS and HISS is an important issue and will need to be addressed in the final Record of Decision. However, the source removal action described in the EE/CAs should not be delayed while it is resolved. The establishment of background levels is a key step in any remediation project. Background levels for radionuclides have been tentatively established, but background levels for groundwater quality have not been addressed in any of the environmental documents.

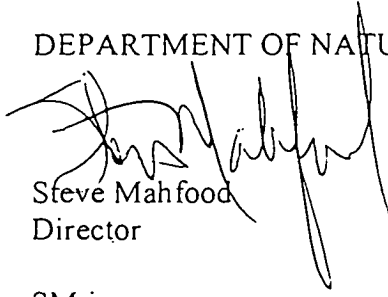
This anticipated cleanup is long overdue. The Corps of Engineers is to be commended for proceeding expeditiously with the cleanup project assigned to it by the Congress.

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I appreciate this opportunity to comment on this very important action proposed for the St. Louis area.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Steve Mahfood
Director

SM:jm

c: Senator John Ashcroft
Senator Christopher S. Bond
Congressman William L. Clay
Congressman Richard A. Gephardt
Congressman James M. Talent
Governor Mel Carnahan
Dennis Grams, Regional Administrator, U.S. EPA Region VII
Maureen Dempsey, Director, Missouri Department of Health
Ric Cavanaugh, St. Louis Oversight Committee